

EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

PAUL W. ROLLINS,

Plaintiff,

vs.

PORTFOLIO RECOVERY ASSOCIATES,
LLC,

Defendant.

CAUSE NO. 4:11-CV-00665-GAF

DECLARATION OF TARA PRIVETTE

NOW COMES Tara Privette and pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. I am over 18 years of age, and am of sound mind.
2. I am familiar with the facts set forth in this Declaration through personal knowledge and/or review of corporate records.
3. I am competent to testify to the matters stated herein.
4. I am familiar with the Complaint filed by Plaintiff Paul Rollins and the allegations contained therein.
5. I am the Senior Vice-President of Operations at Portfolio Recovery Associates, LLC ("PRA").
6. PRA is a Delaware limited liability company with a business office located at 120 Corporate Blvd., Suite 100, Norfolk, Virginia 23502.
7. PRA's business includes, but is not limited to, collecting on unpaid, outstanding account balances.
8. As part of its daily running of business, PRA maintains detailed collection notes ("account notes" or "collection notes") regarding the activity that takes place on each account.

9. Activities such as telephone calls, telephone conversations and written correspondences regarding an account are recorded in detail in the collection notes.

10. The detailed account notes are created and maintained in the regular course of business.

11. The entries into the detailed account notes are made contemporaneously with the events they memorialize.

12. When PRA purchases an account, the account is assigned a file number.

13. PRA purchased the plaintiff's HSBC account in the amount of \$512.54 and assigned it the file number 5155920000966375. Documents produced by Defendant, attached hereto as Group Exhibit A, Collection notes for Plaintiff's account at PRA006. Plaintiff made his last payment on this debt on December 10, 2009. Ex. 2 at PRA006.

14. PRA forwarded an initial validation letter to the plaintiff on February 10, 2011. Ex. A at Initial validation letter, PRA013 – PRA014.

15. The plaintiff did not respond to this letter, dispute his debt, or request verification of the same. Ex. A at PRA006-PRA012.

16. PRA placed calls to 2 telephone numbers belonging to the plaintiff, XXX-XXX-1385 and XXX-XXX-5513, in an attempt to reach the plaintiff. Ex. A at PRA006-PRA012.

17. Between February 21, 2011 and July 6, 2011, a period of about 4 months and 2 weeks, PRA placed 35 calls to the telephone number XXX-XXX-1385. Ex. A at PRA006-PRA012.

18. During this time, PRA placed 10 calls to the telephone number XXX-XXX-5513. Ex. A.

19. However, 9 of these calls did not go through. Ex. A at PRA006-PRA012. The call which did go through was answered by a third-party who stated that the plaintiff was unavailable to speak with PRA. Ex. A at PRA012.

20. PRA never placed calls to Plaintiffs before 8:00AM CST or after 9:00PM CST. Ex. A at PRA006-PRA012.

21. PRA placed the following number of calls to XXX-XXX-1385 during each month of the time period between February 2011 and July 2011: (1) February 2011: 0 (2) March 2011: 3; (3) April 2011: 7; (4) May 2010: 14; (5) June 2010: 7; and (6) July 2011: 4. Ex. A at PRA006-PRA012.

22. PRA placed 1 call to XXX-XXX-5513, on February 21, 2011. Ex. A at PRA012.

23. PRA never placed more than 2 calls in 1 day to the plaintiff. Ex. A at PRA006-PRA012.

24. PRA placed 2 calls in 1 day on two occasions: May 16, 2011 and July 3, 2011. Ex. A at PRA010-PRA011.

25. On May 16, 2011, the calls were placed over 6 hours apart. Ex. A at PRA011.

26. On July 3, 2011, the calls were placed over 2 hours apart. Ex. A at PRA010.

27. On February 21, 2011, May 10, 2011, May 15, 2011, and May 25, 2011, a third-party answered the phone and stated the plaintiff was unavailable. Ex. A at PRA006-PRA012.

28. On March 23, 2011, April 12, 2011, April 20, 2011, May 18, 2011, May 28, 2011, June 13, 2011, and June 21, 2011, the plaintiff answered PRA's call but refused to allow PRA to speak, and the plaintiff terminated the call. Ex. A at PRA006-PRA012.

29. On April 5, 2011, a male answered the phone and immediately terminated the call. Ex. A at PRA011

30. On July 6, 2011, a male answered PRA's call and stated that the number ending in 1385 was a wrong number for the plaintiff. Ex. A at PRA010.

31. PRA waited a minimum of 2 days before attempting to contact the plaintiff again after Plaintiff terminated a call placed by PRA. Ex. A at PRA006-PRA012.

32. PRA was never able to discuss the plaintiff's account with him. Ex. A at PRA006-PRA012.

33. Of the 36 total calls which went through to the plaintiff, 22 went unanswered and 7 were answered by a third-party. Ex. A at PRA006-PRA012.

34. The plaintiff answered the remaining 7 calls and terminated each call before PRA could discuss his account with him. Ex. A at PRA006-PRA012.

35. PRA never called, hung up, and immediately called back. Ex. A at PRA006-PRA012.

36. The plaintiff never placed a single call to PRA. Ex. A at PRA006-PRA012.

37. PRA produced 4 call recordings associated with its attempt to collect the plaintiff's debt. Call Recordings produced by Defendant and served upon Plaintiff on November 9, 2011, electronic correspondence attached hereto as Exhibit B.

38. One of these calls was answered by a third-party. Ex. B.

Recording

PRA: Hello Paul?

Man on phone: Who is this?

PRA: My name is Felicia Cox calling for Paul Rollins.

Man on phone: He's not here.

PRA: He's not there. May I leave a message for him?

Man on phone: Yeah.

PRA: Okay, let me know when you're ready for the number.

Man on phone: Alright.

PRA: Mr. Rollins can return my call at 866-

Man on phone: 866?

PRA: Yes, sir. 428

Man on phone: 428

PRA: 6589

Man on phone: Wait a minute my pen quit writing.

PRA: Okay.

Man on phone: 866

PRA: Mmhmm 428

Man on phone: 4 2 8

PRA: 6589

Man on phone: 6 5 8 9

PRA: and my name is Ms. Cox.

Man on phone: Let me make sure it's right 866-428- huh?

PRA: Yes sir, 428

Man on phone: Wait a minute now 49

PRA: no you have 866 right?

Man on phone: 866, uh huh

PRA: 428

Man on phone: 4 2 8

PRA: 65

Man on phone: 6 5

PRA: 89

Man on phone: 8 9

PRA: Yes, sir.

Man on phone: Okay.

PRA: Okay and he can call me back at his earliest convenience.

Man on phone: Call back who?

PRA: He can call me at his earliest convenience, my name is Miss Cox. C-O-X

Man on phone: C O X?

PRA: Unhuh, Cox

Man on phone: Call you back when?

PRA: He can call me when he's available.

Man on phone: Alright.

PRA: Alright thank you.

39. The plaintiff terminated the other 3 calls with PRA before it could discuss the plaintiff's account with him. Ex. B. The substance of these calls is as follows:

Recording 1:

PRA: Hello, may I speak to Paul Rollins?

Rollins: Yeah

PRA: Hi, this is Tanisha calling from Portfolio Recovery Associates in regard to your HSBC Account. Hello?

Rollins: Who is this?

PRA: This is Tanisha calling from Portfolio Recovery Associates in regards to your HSBC account.

Rollins: Who is you?

PRA: We're, sir, the collection agent for HSBC. You had a Master Card? Hello?

[Call disconnected]

Recording 2:

PRA: Yes, may I speak to Paul?

Rollins: Yes

PRA: Can I speak to Paul?

Rollins: Yeah.

PRA: How you doing Mr. Rollins?

Rollins: How you doing?

PRA: This is Kimberly and I'm calling from Portfolio Recovery Associates. Your HSBC account was forwarded to me today to make a decision on it.

Rollins: Mm Hmm.

PRA: I didn't want to do that without talking to you and getting you involved. I do have to say our calls may be monitored or recorded. This an attempt to collect by a debt collector ---

Rollins: She didn't send me no, she didn't send me no letter out.

PRA: ---Okay, and any information obtained will be used for that purpose.

Rollins: I don't have nothing. You know that don't make sense to send me something out I don't know nothing about.

PRA: Sir, we are a third-party collection agency. Mr. Rollins?

[Call disconnected]

Recording 3:

Rollins: Hello.

PRA: Paul?

Rollins: Hello.

PRA: Paul?

Rollins: Hello, who is this?

PRA: This is Anthony, may I speak to Paul.

Rollins: Yes.

PRA: Paul Rollins?

Rollins: Yeah.

PRA: Hey, how you doing?

Rollins: Alright.

PRA: Okay, once again my name is Anthony I'm calling from Portfolio Recovery Associates in regards to an account that you have here in my office through HSBC Bank. I do need to state by law that our call may be monitored or recorded. This is an attempt to collect a debt by a debt collector, and any information obtained will be used for that purpose. Hello?

[Call disconnected]

Ex. B.

Tara Privette
Tara Privette

EXHIBIT A



Main Menu	Search	Work List	Answer	Break	End Session	Help Desk
FRA Intranet	Skip Links		Timed	ODI	Mor Reports	Manual Transfer

	Account: 5155920000966375	Responsibility: CBL	Status: PPRG	HP Days: 60
Edit/View Account Relations			CBR: 11/19/2016	SOL: 11/19/2015

No linked Accounts found for Debtor 1

ROLLINS; PAUL W		DOB: [REDACTED]
Relation: PfmDebtor	SSN: [REDACTED]	
Address1: [REDACTED]		
Address2: [REDACTED]		
City: [REDACTED]	State: [REDACTED]	
County: [REDACTED]	Zip: [REDACTED]	
Location: OTHER	Skip Module 26/2011	

Time Zone:	Central	Is Cell?	Language:
Dial Home	[REDACTED] 4913	<input type="checkbox"/>	Hold Release
Dial Work	[REDACTED]	<input type="checkbox"/>	Drop Call
Dial Other	[REDACTED] 1385	<input type="checkbox"/>	
Transfer To Ext	[REDACTED]		Complete transfer
Leave Message	Main Debtor		Cancel Transfer

Required Disclosure Statements

Purchase	Putback	Loan Date	Charge Off	Delq Date	Last Pay Date
1/24/2011	7/23/2011	11/7/2008	7/31/2010	1/18/2010	12/10/2009

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PR006

Last Contact		PTP Date		CBRRcvd		StopCBR		Hold Date	
6/21/2011		N/A		N/A		N/A			

Get Payment History		Add Bankruptcy Information	
Original Bal	\$512.54	PIF	\$512.54
ChgOff Amt	\$512.54	Accrued Int	\$0.00
Last Pay Amt	\$60.00	Allowance	0.00
Promises	\$0.00	NBial	\$512.54
NSFs	\$0.00 (0)	Documents	None
Orig Rate	0.00%	Current Rate	0.00%
Min Amt For PIF Bonus	\$512.54		

Seller: **HSBC BANK NEVADA, N.A.**

Merchant:

Original Creditor: **HSBC BANK NEVADA, N.A.**

Make Payments to: **PORTFOLIO RECOVERY ASSOCIATES, LLC**

P.O. BOX 12914
NORFOLK VA 23541

Prod Code **MC**
Pool **HSBK21**

Credit Bureau	Request Letters	Calculate Rate	Transfer Account	Puback Request Docs	Supplemental Info
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Add Note	Payment	Entry	ACT	RST	Note
7/8/2011 10:02:17 AM		NJM	INC	CND	RCVD from PACER Complaint re: Paul Rollins, FWD to Counsel.
7/8/2011 9:10:46 PM		PRB11	DO	DIS	Wrong Number 1385 (OTHER) MOP SAID N1 DOESNT LIVE THERE AND HEIDNK N1
7/8/2011 5:13:58 PM		DH	NA	Dialed	4913)No Answer
7/9/2011 9:49:27 PM		DH	NA	Dialed	4913)No Answer
7/9/2011 9:48:40 PM		DO	NA	Dialed	1385)Answering machine
7/9/2011 7:46:23 PM		DH	NA	Dialed	4913)No Answer
7/9/2011 7:45:38 PM		DO	NA	Dialed	1385)Answering machine
7/11/2011 3:21:16 PM		DO	NA	Dialed	1385)No Answer
7/11/2011 3:20:28 PM		DH	NA	Dialed	4913)No Answer

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PRA007

Dialer Dialed Other: 1385

6/21/2011 9:23:35 PM PRT144 DO STC DOESN'T KNOW ABOUT AND HE BEFORE COULD SAY ANYTHING ABOUT THE
ACGT
A
R

6/21/2011 9:21:43 PM DH NA Dialed () 4913)No Answer
6/21/2011 4:50:28 PM DH NA Dialed () 4913)No Answer
6/19/2011 7:21:33 PM DO LM Dialed () 1385)Virtual msg to AUTOV
6/18/2011 9:22:49 PM DO NA Dialed () 1385)No Answer
6/16/2011 9:21:58 PM DH NA Dialed () 4913)No Answer
6/16/2011 5:49:50 PM DH NA Dialed () 4913)No Answer

6/13/2011 9:18:16 PM PRT603 DO NM Hang Up at 1385 [OTHER]
N1 HUNG UP DURING MM

6/13/2011 10:34:53 AM DH NA Dialed () 4913)No Answer
6/10/2011 4:35:00 PM DH NA Dialed () 4913)No Answer
6/8/2011 8:01:05 PM DH NA Dialed () 4913)No Answer
6/9/2011 9:00:18 PM DO NA Dialed () 1385)No Answer
6/9/2011 4:11:36 PM DH NA Dialed () 4913)No Answer
6/7/2011 9:31:52 PM DO NA Dialed () 1385)No Answer
6/7/2011 9:31:05 PM DH NA Dialed () 4913)No Answer
6/7/2011 10:51:19 AM DH NA Dialed () 4913)No Answer
6/5/2011 8:36:59 PM DO NA Dialed () 1385)No Answer
6/5/2011 9:36:12 PM DH NA Dialed () 4913)No Answer

5/28/2011 9:46:17 AM PRT220 DO STC No Promise at 1385 [OTHER]
n1 atty name is then the fu

5/26/2011 8:48:38 PM DH NA Dialed () 4913)No Answer
5/26/2011 8:47:51 PM DO NA Dialed () 1385)No Answer
5/26/2011 9:02:35 AM DH NA Dialed () 4913)No Answer

5/25/2011 10:38:09 AM PRP025 DO STC DIALED RELATION 1 OTHER: 1385, MOP SD N1 NOT IN NML, CALL
BACK

5/25/2011 10:34:28 AM DH NA Dialed () 4913)No Answer

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PRA008

5/23/2011 9:20:02 PM	DH	NA	Dialled (██████████) 4913) No Answer
5/23/2011 9:19:15 PM	DO	NA	Dialled (██████████) 1385) No Answer
5/23/2011 3:59:53 PM	DH	NA	Dialled (██████████) 4913) No Answer
5/18/2011 8:18:57 PM	PRA333	DO	NM
			Hang Up at ██████████ 1385 [OTHER]
			CUST HU
5/18/2011 10:07:39 AM	DH	NA	Dialled (██████████) 4913) No Answer
5/18/2011 9:13:59 PM	DH	NA	Dialled (██████████) 4913) No Answer
5/16/2011 5:55:44 PM	DO	NA	Dialled (██████████) 1385) No Answer
5/16/2011 5:52:57 PM	DH	NA	Dialled (██████████) 4913) No Answer
5/16/2011 11:38:43 AM	DO	NA	Dialled (██████████) 1385) Answering machine
5/16/2011 11:38:05 AM	DH	NA	Dialled (██████████) 4913) No Answer
5/15/2011 5:16:34 PM	PRA391	DO	NM
			Hang Up at ██████████ 1385 [OTHER]
5/13/2011 8:56:00 PM	DH	NA	Dialled (██████████) 4913) No Answer
5/13/2011 8:55:18 PM	DO	NA	Dialled (██████████) 1385) No Answer
5/13/2011 2:05:49 PM	DH	NA	Dialled (██████████) 4913) No Answer
5/11/2011 9:04:32 PM	DH	NA	Dialled (██████████) 4913) No Answer
5/11/2011 9:03:45 PM	DO	NA	Dialled (██████████) 1385) No Answer
5/11/2011 10:32:23 AM	DH	NA	Dialled (██████████) 4913) No Answer

ID: NJM	Last Activity: 10:02 AM	Unit: COUNSL	User: NJMAHLMANN
Get Last Worked	Time Tracker: INACTIVE	Work: TBD	Manager:

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PRA009

Date	Entry	ACT	RST	Note
7/8/2011 5:50:11 PM		DH	NA	Dialed (██████)4913)No Answer
7/8/2011 10:09:39 AM	NJM	XYZ	XYZ	Old Header Note: //ACCOUNT I LITIGATION ALL CALSL TO S. ZAHN EXT 12512// 7/8/2011 10:01:41 AM NJM
7/8/2011 10:02:17 AM	NJM	INC	CND	RCVD from PACER Complaint re: Paul Rollins, FWD to Counsel.
7/8/2011 9:53:40 AM		DH	NA	Dialed (██████)4913)No Answer
7/6/2011 9:10:46 PM	PRB811	DO	DIS	Wrong Number - (██████)1385 [OTHER] MOP SAID N1 DOESNT LIVE THERE AND HE DNK N1
7/8/2011 5:13:58 PM		DH	NA	Dialed (██████)4913)No Answer
7/3/2011 9:49:27 PM		DH	NA	Dialed (██████)4913)No Answer
7/3/2011 9:48:40 PM		DO	NA	Dialed (██████)1385)Answering machine
7/3/2011 7:46:23 PM		DH	NA	Dialed (██████)4913)No Answer
7/3/2011 7:45:36 PM		DO	NA	Dialed (██████)1385)Answering machine
7/1/2011 3:21:16 PM		DO	NA	Dialed (██████)1385)No Answer
7/1/2011 3:20:28 PM		DH	NA	Dialed (██████)4913)No Answer
				Dialer Dialed Other: (██████)1385
				R-
				E-
6/21/2011 9:23:35 PM	PRT144	DO	STC	P-N1 SD THT NO ONE SENT HIM A # AND HE CANT PAY ON SOMETHING HE DOESNT KNOW ABOUT AND HU BEFORE I COULD SAY ANYTHING ABOUT THE ACCT
				A-
				I-
				R-
6/21/2011 9:21:43 PM		DH	NA	Dialed (██████)4913)No Answer
6/21/2011 4:50:23 PM		DH	NA	Dialed (██████)4913)No Answer
6/19/2011 7:21:33 PM		DO	LM	Dialed (██████)1385)Virtual msg to AUTOV
6/16/2011 9:22:49 PM		DO	NA	Dialed (██████)1385)No Answer
6/16/2011 9:21:58 PM		DH	NA	Dialed (██████)4913)No Answer
6/16/2011 5:49:50 PM		DH	NA	Dialed (██████)4913)No Answer
6/13/2011 9:16:16 PM	PRT803	DO	NM	Hang Up at (██████)1385 [OTHER] N1 HUNG UP DURING MM
6/13/2011 10:34:53 AM		DH	NA	Dialed (██████)4913)No Answer
6/10/2011 4:35:00 PM		DH	NA	Dialed (██████)4913)No Answer
6/9/2011 9:01:05 PM		DH	NA	Dialed (██████)4913)No Answer
6/9/2011 9:00:18 PM		DO	NA	Dialed (██████)1385)No Answer
6/9/2011 4:11:36 PM		DH	NA	Dialed (██████)4913)No Answer
6/7/2011 9:31:52 PM		DO	NA	Dialed (██████)1385)No Answer
6/7/2011 9:31:05 PM		DH	NA	Dialed (██████)4913)No Answer
6/7/2011 10:51:19 AM		DH	NA	Dialed (██████)4913)No Answer
6/5/2011 9:36:59 PM		DO	NA	Dialed (██████)1385)No Answer
6/5/2011 9:36:12 PM		DH	NA	Dialed (██████)4913)No Answer
5/28/2011 9:46:17 AM	PRT220	DO	STC	No Promise at (██████)1385 [OTHER] n1 atty name is then he hu
5/26/2011 8:48:38 PM		DH	NA	Dialed (██████)4913)No Answer
5/26/2011 8:47:51 PM		DO	NA	Dialed (██████)1385)No Answer
5/26/2011 9:02:35 AM		DH	NA	Dialed (██████)4913)No Answer
5/25/2011 10:38:09 AM	PRP025	DO	STO	DIALED RELATION 1 OTHER: (██████)1385, MOP SD N1 NOT IN, NML, CALL BACK
5/25/2011 10:34:28 AM		DH	NA	Dialed (██████)4913)No Answer
5/23/2011 9:20:02 PM		DH	NA	Dialed (██████)4913)No Answer

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PRA010

5/23/2011 9:19:15 PM DO NA Dialed (██████)1385)No Answer
 5/23/2011 3:59:53 PM DH NA Dialed (██████)4913)No Answer
 5/18/2011 8:18:57 PM PRA333 DO NM Hang Up at (██████)1385 [OTHER]
 CUST HU
 5/18/2011 10:07:39 AM DH NA Dialed (██████)4913)No Answer
 5/16/2011 9:13:59 PM DH NA Dialed (██████)4913)No Answer
 5/16/2011 5:53:44 PM DO NA Dialed (██████)1385)No Answer
 5/16/2011 5:52:57 PM DH NA Dialed (██████)4913)No Answer
 5/16/2011 11:38:43 AM DO NA Dialed (██████)1385)Answering machine
 5/16/2011 11:38:05 AM DH NA Dialed (██████)4913)No Answer
 5/15/2011 5:16:34 PM PRA391 DO NM No Msg at (██████)1385 [OTHER]
 5/13/2011 8:56:00 PM DH NA Dialed (██████)4913)No Answer
 5/13/2011 8:55:13 PM DO NA Dialed (██████)1385)No Answer
 5/13/2011 2:05:49 PM DH NA Dialed (██████)4913)No Answer
 5/11/2011 9:04:32 PM DH NA Dialed (██████)4913)No Answer
 5/11/2011 9:03:45 PM DO NA Dialed (██████)1385)No Answer
 5/11/2011 10:32:23 AM DH NA Dialed (██████)4913)No Answer
 5/10/2011 8:29:36 PM PRA382 DO LM Left Msg at (██████)1385 [OTHER]
 LM W/MOP
 5/10/2011 9:32:50 AM DH NA Dialed (██████)4913)No Answer
 5/8/2011 9:01:10 PM DH NA Dialed (██████)4913)No Answer
 5/8/2011 9:00:23 PM DO NA Dialed (██████)1385)No Answer
 5/6/2011 9:40:30 AM DH NA Dialed (██████)4913)No Answer
 5/4/2011 10:33:13 AM PRP071 DO STO DIALED RELATION 1 OTHER: (██████)1385 MOP HU AFTER ASKED
 FOR N1...
 5/4/2011 10:29:30 AM DH NA Dialed (██████)4913)No Answer
 5/2/2011 8:49:59 PM DH NA Dialed (██████)4913)No Answer
 5/2/2011 8:49:12 PM DO NA Dialed (██████)1385)No Answer
 5/2/2011 10:17:07 AM DH NA Dialed (██████)4913)No Answer
 4/29/2011 10:02:24 AM DH NA Dialed (██████)4913)No Answer
 4/20/2011 8:28:49 PM PRA179 DO NM Hang Up at (██████)1385 [OTHER]
 N1 SAID THAT HE DID NOT HAVE AN ACCT AND DX'D CALL
 4/20/2011 10:24:34 AM DH NA Dialed (██████)4913)No Answer
 4/12/2011 10:38:33 AM PRP068 DO STC DIALED RELATION 1 OTHER: (██████)1385 N1 HU AFTER STTNG MM
 4/12/2011 10:34:24 AM DH NA Dialed (██████)4913)No Answer
 4/9/2011 1:36:31 PM PRA264 DO NM Hang Up at (██████)1385 [OTHER]
 N1 HUNG UP DURING OPENING STATEMENT
 4/7/2011 8:16:00 PM DH NA Dialed (██████)4913)No Answer
 4/7/2011 8:15:13 PM DO NA Dialed (██████)1385)No Answer
 4/7/2011 4:00:33 PM DH NA Dialed (██████)4913)No Answer
 4/5/2011 10:50:01 AM PRP027 DO STO DIALED RELATION 1 OTHER: (██████)1385; MOP SD HELLO THEN
 HU
 4/5/2011 10:45:41 AM DH NA Dialed (██████)4913)No Answer
 4/4/2011 6:50:20 PM PRH293 DO NM Hang Up at (██████)1385 [OTHER]
 N1 HU
 4/4/2011 9:21:21 AM DH NA Dialed (██████)4913)No Answer
 4/2/2011 2:32:36 PM DH NA Dialed (██████)4913)No Answer
 4/2/2011 2:31:49 PM DO NA Dialed (██████)1385)Answering machine
 Dialer Dialed Other: (██████)1385

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PRA011



Portfolio Recovery Associates, LLC
We're giving debt collection a good name.

PRA0018-0209-125200619 1755

February 10, 2011
Account/Reference No.: 5155920000966375
HSBC BANK NEVADA N.A.

Balance: \$512.54

www.portfoliorecovery.com

Welcome to Portfolio Recovery Associates!

Portfolio Recovery Associates purchased the account referenced above on 01/24/11. All future payments and correspondence for this account, including credit counseling service payments, should be directed to us.

Call toll-free at 1-800-772-1413 to discuss payment arrangements.
7:30 AM to 11 PM Mon.-Fri., 8 AM to 5 PM Sat., & 2 PM to 9 PM Sun. (EST)
Contact us at help@portfoliorecovery.com to communicate with us by e-mail.

Various Payment Options Available Including:

Pay by Phone: ☎	Mail: ✉	Online: 💻
<ul style="list-style-type: none"> • Authorize automatic withdrawals from your bank account • Complete a credit card* payment 	<ul style="list-style-type: none"> • Complete the attached coupon • Make all checks and payments to: Portfolio Recovery Associates, LLC P.O. Box 12914 Norfolk, VA 23541 	<ul style="list-style-type: none"> • Complete a payment from your checking account or credit card* • Pay online at: www.portfoliorecovery.com

* See back for information about credit card transaction fees that may be applied by third party vendors.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor if different from the current creditor.

This letter is from a debt collector and is an attempt to collect a debt.
Any information obtained will be used for that purpose.

Notice: See Reverse Side for Important Information

*** PLEASE DETACH AND RETURN IN THE ENCLOSED ENVELOPE WITH YOUR PAYMENT ***

Dept 822
PO BOX 4115
Concord, CA 94524

Account/Reference Number: 5155920000966375

Payment Amount: _____

Address Service Requested

#BWNFTZF #PRA8048516811026#



PAUL W ROLLINS

0018
PORTFOLIO RECOVERY ASSOCIATES LLC
P.O. BOX 12914
NORFOLK VA 23541

CONFIDENTIAL

PRA 013

MAKE ALL CHECKS PAYABLE TO: Portfolio Recovery Associates, LLC
SEND ALL PAYMENTS TO: Portfolio Recovery Associates, LLC, P.O. Box 12914, Norfolk, VA 23541

COMPANY ADDRESS

Portfolio Recovery Associates, LLC, 120 Corporate Boulevard, Norfolk, VA 23502

DISPUTES CORRESPONDENCE ADDRESS

PRA Disputes Department, 140 Corporate Boulevard, Norfolk, VA 23502
 Disputes Department E-mail Address: PRA_Disputes@portfoliorecovery.com

CREDIT CARD TRANSACTION FEES: Third party vendors may charge a transaction fee for processing payments made by credit card; however, PRA does not charge or accept any fees. Please discuss this option with our staff if you have any questions.

QUALITY SERVICE SPECIALISTS AVAILABLE Mon. - Fri. 8 AM to 5 PM (EST)

Not happy with the way you were treated? Our company strives to provide professional and courteous service to all our customers. Contact one of our staff to discuss issues related to our quality of service to you by phone at (866) 925-7109 or by e-mail at qualityservice@portfoliorecovery.com.

PRIVACY NOTICE: We collect certain personal information about you from the following sources: (a) information we received from you; (b) information about your transactions with our affiliates, others, or us; (c) information we receive from consumer reporting agencies. We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. We restrict access to nonpublic information about you to those employees and entities that need to know that information in order to collect your account. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

NOTICE: If this account is eligible to be reported to the credit reporting agencies by our company, we are required by law to notify you that a negative credit report reflecting on your credit records may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligation.

We are required under state law to notify consumers of the following rights. This list does not include a complete list of rights consumers have under state and federal laws:

CALIFORNIA: The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 8 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov. Nonprofit credit counseling services may be available in the area.

COLORADO: Office located at 4600 South Syracuse Street, Suite 938, Denver, CO 80237. Telephone 1-866-508-4751. FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE www.coloradoattorneygeneral.gov/ca. A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

MAINE: Telephone number at licensed location is (800) 772-1413. Hours of operation at licensed location are 7:30 AM to 11 PM EST Monday through Friday, 8 AM to 5 PM EST Saturday, and 2 PM to 9 PM EST Sunday.

MASSACHUSETTS: Office located 49 Winter St, Weymouth, MA 02188. Telephone (800) 772-1413. Hours of operation are 9 AM to 6 PM EST Monday through Thursday. **NOTICE OF IMPORTANT RIGHTS: YOU HAVE THE RIGHT TO MAKE A WRITTEN OR ORAL REQUEST THAT TELEPHONE CALLS REGARDING YOUR DEBT NOT BE MADE TO YOU AT YOUR PLACE OF EMPLOYMENT. ANY SUCH ORAL REQUEST WILL BE VALID FOR ONLY TEN DAYS UNLESS YOU PROVIDE WRITTEN CONFIRMATION OF THE REQUEST POSTMARKED OR DELIVERED WITHIN SEVEN DAYS OF SUCH REQUEST. YOU MAY TERMINATE THIS REQUEST BY WRITING TO THE DEBT COLLECTOR.**

NEW YORK CITY: City of New York License Number 1096994.

NORTH CAROLINA: Collection Agency Permit No. 4132.

TENNESSEE: This collection agency is licensed by the Tennessee Collection Service Board of the Department of Commerce and Insurance. (#00000770)

CONFIDENTIAL

PRA 014

EXHIBIT B

Avanti Bakane /HC01
11/09/2011 01:31 PM







To Mark Meinhardt <meinhardtlaw@sbcglobal.net>
cc Johnny S. Wang/HC12@HC
bcc
Subject Rollins v. PRA - Documents Produced

For Follow Up: Urgent Priority

Mark,

Attached please find the documents and call recordings produced by PRA, as well as the fully executed Confidentiality Agreement.

Thanks,
Avanti

 Rollins_Confidentiality Agreement.pdf  Rollins_Production Docs.pdf  Recording4.wav
 Recording1.wav  Recording2.wav  Recording3.wav

Avanti Bakane
Hinshaw & Culbertson LLP
222 N. LaSalle Street
Suite 300
Chicago, IL 60601
ph: 312/704-3167
fax: 312/704-3001
abakane@hinshawlaw.com
<http://www.hinshawlaw.com/abakane/>